

# **EXHIBIT 10**



**Kilpatrick Townsend & Stockton LLP**  
ktslaw.com

Suite 3700, 1420 Fifth Avenue  
Seattle, WA 98101

January 22, 2025

direct dial 206 224 2857  
direct fax 206 299 3458  
dmachleidt@ktslaw.com

*Via Email*

Donald McPhail  
Eric R. Chad  
Paige S. Stradley  
Merchant & Gould  
150 S 5th St Unit 2200,  
Minneapolis, MN 55402

Re: *Valve Corp. v. Leigh Rothschild et al.*, No. 2:23-cv-1016 (W.D. Wash.): Additional  
response to Defendants' search term proposal

---

Counsel:

We have not received a response on numerous outstanding items from Valve's January 10, 2025 letter despite requesting such information by January 15. Please provide times this week or early next week you are available to meet and confer regarding:

- Hit counts for search terms run against Christina Arias and Leigh Rothschild
- Hit counts from Mr. Falcucci's SharePoint for the remaining search terms not included in your January 3 and January 9 emails
- Hit counts for the revised search terms provided in Valve's January 10 letter
- Confirmation whether Defendants do not refer to patents by just the last three digits (e.g., 221 or '221) in the ordinary course of business
- Confirmation whether Defendants have searched all Outlook archives
- Date certain when Defendants will begin producing documents on the agreed-upon search terms

To accommodate the syntax requirements of search terms in Outlook and File Explorer, Valve proposes the below modifications to the remaining two search terms:

- Infringe OR infringes OR infringement OR infringing OR infringer OR demand OR threat OR assert OR target OR campaign OR enforce OR sue OR lawsuit
- Settlement OR license OR agreement

Page 2

By January 27, please confirm whether Defendants agree to search for documents responsive to these hit counts or, if not, identify any objections or modifications.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dario', with a long horizontal flourish extending to the right.

Dario A. Machleidt